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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8
9 UNITED STATES OF AMERICA, } CASE NO: 2:22-cr-00142-CDS-DJA
10 Plaintiff }
11 vs. } **Order Approving STIPULATION
REGARDING BRIEFING SCHEDULE
FOR POST-TRIAL MOTIONS**
12 MEELAD DEZFOOLI } (Third Request)
13 Defendant } [ECF No. 303]
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18 IT IS HEREBY STIPULATED AND AGREED by and between Jason M. Frierson,
19 United States Attorney; and David Zachry Adams and Taylor G. Stout, Trial Attorneys,
20 Criminal Division, U.S. Department of Justice, Money Laundering and Asset Recovery
21 Section; and Assistant United States Attorney, Daniel R. Schiess, counsel for the United
22 States of America; and Defendant MEELAD DEZFOOLI by and through his attorney, Lucas
23 J. Gaffney, Esq., as follows:

24 1. The jury returned its verdicts in the present case on September 4, 2024, as to the charges
25 contained in the Superseding Indictment, and on September 5, 2024, as to the
26 Forfeiture allegations contained therein. The post-trial motions MEELAD DEZFOOLI
intended to file are due on December 5, 2024. See ECF No. 256,259,277,278.

1 2. On October 2, 2024, this Court appointed new counsel to represent MEELAD
2 DEZFOOLI for post-trial motions and sentencing. Given his relatively recent
3 appointment, current counsel requires an extension of time to familiarize himself with
4 the testimony and evidence presented at trial before filing the post-trial motions.

5 3. The trial took eight (8) days and involved the testimony of twenty-five (25) witnesses.
6 There is also a significant amount of related material in the form of trial exhibits which
7 must be reviewed in order to draft effective post-trial motions pursuant to Rules 29 and
8 33 of the Federal Rules of Criminal Procedure. All of which necessitate an extension of
9 the due dates for said motions and a modification of the normal briefing schedule for
10 oppositions and replies.

11 4. On October 4, 2024, current counsel requested MEELAD DEZFOOLI'S trial transcripts
12 for the purpose of identifying which issues should be raised in post-trial motion(s). Court
13 Reporter/Recorder Samantha McNett initially indicated it will take up to thirty (30) days
14 to prepare the transcripts.

15 5. On October 10, 2024, MEELAD DEFOOLI filed an unopposed motion to extend the
16 briefing schedule for his post-trial motions. ECF No. 277. On October 15, 2024, this
17 Court granted the motion, and set a due date of December 6, 2024, for the post-trial
18 motions.

19 6. On November 14, 2024, Samantha McNett filed a Motion for Extension of Time to File
20 Transcript in MEELAD DEZFOOLI'S Ninth Circuit Court of Appeals case number 24-
21 5752. *See* Dkt Entry 7.1. The motion indicated the trial transcripts would not
22 be completed until December 16, 2024.¹

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¹ On November 21, 2024, the Ninth Circuit dismissed the appeal, however, Ms. McNett still needs until December 16th to finish all the requested transcripts.

7. Given the delay in completing the trial transcripts MEELAD DEZFOOLI respectfully requests a sixty (60) day extension to file his post-trial motions.
8. Counsel for the United States of America—David Zachery Adams, Taylor G. Stout, and Daniel R. Schiess—do not object to a 60-day continuance of the post-trial motion briefing schedule.
9. The parties hereby stipulate and agree that MEELAD DEZFOOLI'S motions pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure shall be due on or before February 13, 2025, and responses or oppositions to said motions shall be filed on or before February 27, 2025. MEELAD DEZFOOLI'S reply brief shall be filed on or before March 10, 2025.²

IT IS SO STIPULATED this 4th day of December 2024.

Respectfully submitted,

JASON FRIERSON

United States Attorney

LUCAS J. GAFF

/s/ *Dan Schiess*

DANIEL R. SCHIESS

LUCAS J. GAFFNEY, ESQ.
Attorney for Meelad Dezfooli

Attorney for the United States of America

/s/ Taylor Stout

Taylor G. Stout

Attorney for the United States of America

/s/ David Adams

David Zachary Adams

Attorney for the United States of America

IT IS SO ORDERED.

~~CRISTINA D. SILVA
UNITED STATES DISTRICT JUDGE~~

Dated: December 6, 2024

² The parties are mindful the proposed briefing schedule extends beyond the current sentencing date of February 13, 2025. The parties intend to make a concerted effort to complete the post-trial motion briefing prior to the suggested deadlines in hopes of maintaining the current sentencing date.